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09/23/02 12:28 PM

To: <ceq_nepa@fs.fed.us>
cc: "brent martin" <gfw@ellijay.com>, "angela martin"
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Subject: NEPA comments

To whom it may concern:

Please see the attached comments and accept them into consideration.

Thank you,

Katherine Groves
Georgia Forestwatch
Staff Ecologist



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Georgia Forestwatch is a grassroots environmental organization dedicated to the restoration and conservation of the native forest ecosystems on public lands in Georgia. We have worked closely with the Forest Service for the last sixteen years. We are very familiar with the NEPA process and analyzing the resultant documents because of this interaction. We were involved in the last forest plan revision process on the Chattahoochee/Oconee National Forest and are intimately involved with this one. We are also members of the Regional and National Stewardship Contracting teams. We feel that we have a good perspective about the NEPA process, how it works, and in some cases how it doesn't.

Though at times the NEPA process can be frustrating for both the agency and those outside the agency trying to provide meaningful input, it is without a doubt a very important law. Without it, the public would have little or no say in how their lands are managed. NEPA is also necessary in the continuing effort to protect and restore our native ecosystems. We applaud your efforts to better the law and make it more useful. But we also caution that it would be very easy to undermine a benchmark that is both useful and important. We urge you not to do this.

- A. Technology, Information Management, and Information Security: The NEPA Task Force will explore opportunities for utilizing information management technologies to enhance the effectiveness and efficiency of the NEPA process. Specific examples of innovative technical approaches to the assessment and communication of potential environmental impacts are sought. Examples include use of geographic information system (GIS) software, document creation and comment management systems. The handling of sensitive infrastructure and operational information will be reviewed. The Task Force seeks your input on this topic and requests responses to the following questions.

Ecology and Resource Management are becoming more and more dependant on computer modeling and technology. This can be very advantageous. Technology can help us keep track of a seemingly infinite amount of information and provide answers to difficult questions. We encourage the Forest Service to make use of the latest technology. However, it can also be detrimental. Ecological modeling and predictive programs are not reality. They are subject to error and the information that is produced by them is only as accurate as the information that is entered into them. Often it is wrong. Examples of this include CISC data that is often admittedly inaccurate and Spectrum modeling which is used in Forest Plan revisions and is unable to approximate for natural processes. Though technology can be used as a very valuable tool, there is no substitute for having trained personnel in the field checking the data. In recent proposals to change the Biological Evaluations and the Vegetative Management EIS procedures to survey for PETS species in

the Southern Region, the reliance was on risk management based on technology rather than educated, trained personnel checking the area for PETS species. This type of reliance on technology is dangerous and can lead to disastrous errors.

We also feel that there is a disconnect between what the best available science indicates and the implementation of projects on the ground. It is often difficult to find little known papers produced from within the agency that seem to guide the management of the forests. Providing a direct link between the science used and the management implemented would be helpful. Offering these items as part of the process record could provide this linkage. Oftentimes there is conflicting science and the decisions about how a decision was reached are not clear. Though much of the general public may not want to know this kind of detail, it should be readily available for those who choose to inquire. We feel that the key to this question lies in communication. Scoping letters and decisions should provide some reference material and be clear about the process of decision-making. We also feel that this information should be available in digital form, either via the Forest Service websites, e-mail, or CD-ROM, but also in hard copy for those that do not have access to computers.

- D. Adaptive Management/Monitoring and Evaluation Plans: The CEQ report, "The National Environmental Policy Act: A study of Its Effectiveness After Twenty-five Years", recognized that by incorporating adaptive management into their NEPA analyses, agencies can move beyond simple compliance and better target environmental improvement. An adaptive environmental management approach can respond to uncertainty and the limits of knowledge and experience in making decisions. Such an approach allows for approval of an action with uncertain outcomes by establishing performance-based environmental parameters or outcomes and monitoring to ensure that they are achieved. When those parameters or outcomes are not met, corrective changes would be triggered, for instance to ensure that significant environmental degradation does not occur. The Task Force seeks your input on this topic and requests responses to the following questions.

Adaptive management is a concept that most environmentalists could agree with. Unfortunately, in order for adaptive management to work, large-scale analysis must be done as well as proper project analysis. This means that funding must be available for surveys and monitoring. In the past, adaptive management has been used without extensive surveys and monitoring, so it was ineffective and subject to appeal. Specifically, surveying for specific species or suites of species must be done on a broad scale before implementing projects that would propose to improve or affect their habitat. This type of survey can be costly, and time consuming to do. There must be a dedicated well-funded program with trained personnel in place. There are questions of exactly how monitoring will be done, which kind of monitoring is effective, and how that might change as

science progresses. These questions can be answered differently for different species and different ecoregions. However, it is important that the latest science be used, which goes back to question A. Implementation of such a program is problematic. We encourage the Forest Service to move in a direction that will implement this type of program. The problem as we see it rests primarily with the lack of funding and support for adequately implementing this type of program.

- E. Categorical Exclusions: Agencies can identify categories of actions that do not individually or cumulatively have a significant effect on the human environment and which, therefore, do not require preparation of an Environmental Assessment or an Environmental Impact Statement. The NEPA Task Force will consider the bases and process for establishing categorical exclusions. The Task Force seeks your input on this topic and requests responses to the following questions.

Projects that are categorically excluded are not subject to public input or environmental analysis. Recently, there have been proposed changes to the regulations about Categorical Exclusions (CE). This was done in an effort to streamline the NEPA process. However, it weakens the act by not requiring any environmental analysis. Categorical Exclusions were intended to be used as a means to implement small projects that shouldn't adversely effect the environment. However, many of the projects that can be categorically excluded, such as road building and timber harvesting, certainly effect the environment. Many small projects in the same area will provide a cumulative effect that will undoubtedly adversely impact the environment. This has and will continue to be abused. For this reason, we would like to see the limits on CEs drastically reduced rather than increased. Consideration of the effects of other projects (particularly recent ones) in the area should be considered before a CE is issued. Adequate studies of the watershed in which the project is proposed should be ongoing and therefore easy to incorporate. Unfortunately, in many cases, there is not adequate data and therefore a CE is preferred so that time intensive studies will not be required. That is unacceptable, when the data is not available, no projects should be done until it has been acquired.